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5 UNITED STATES DISTRICT COURT
6 FOR THE WESTERN DISTRICT OF WASHINGTON
7 AT TACOMA

8 DREW MACEWEN, ANDREW BARKIS,
9 CHRIS CORRY, BRANDON VICK, KELLY
10 CHAMBERS, MICHAEL MCKEE, FRAN
11 WILLS, BRUCE RUSSELL, Phil Fortunato,
12 Dave McMullan, Isaac Vellekamp, and Marcus
13 Torrey,

14 *Plaintiffs,*

15 v.

16 JAY INSLEE, in his official capacity as the
17 Governor of Washington,

18 *Defendant.*

19 No. 3:20-cv-05423

20 DECLARATION OF CHRIS CORRY

21 I, Chris Corry, make the following declaration under penalty of perjury:

22 1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated
23 herein.
24 2. I am a resident of Yakima County Washington, and elected state representative for the 14th
25 Legislative District.
26 3. I also work as a salesman in Washington state.
27 4. I normally meet with clients and potential clients in person as part of my business.
28 5. I am prohibited from meeting with clients and potential clients in person as a result of the
29 Proclamations.

30 MACEWEN V. INSLEE

31 DECLARATION OF CHRIS CORRY - 1

32 No. 3:20-cv-05423

33 ARD LAW GROUP PLLC

34 P.O. Box 11633
35 Bainbridge Island, WA 98110
36 Phone: (206) 701-9243

- 1 6. Many of my clients and potential clients find remote meeting technology inadequate to their
- 2 needs.
- 3 7. I cannot make sales to my clients or potential clients without meeting with them.
- 4 8. I am unable to make sales as a result of the Proclamations.
- 5 9. But for the Proclamations, I would be able to make sales.
- 6 10. I am losing money every day due to the Proclamations.
- 7 11. I normally receive medical and dental care in Washington state.
- 8 12. My medical and dental health providers are closed as a result of the Proclamations.
- 9 13. But for the Proclamations, my medical and dental health providers would be open.
- 10 14. I am deprived of medical and dental care due to the Proclamations.
- 11 15. My children also live in Washington state.
- 12 16. My children also normally receive medical and dental care in Washington state.
- 13 17. My children's medical and dental health providers are closed as a result of the Proclamations.
- 14 18. But for the Proclamations, my children's medical and dental health providers would be open.
- 15 19. My children are deprived of medical and dental care due to the Proclamations.
- 16 20. My foster daughter wears dental braces.
- 17 21. My foster daughter's braces are currently faulty.
- 18 22. My foster daughter needs prompt dental attention in order to have her braces fixed.
- 19 23. Getting her braces fixed is among the medical and dental care that my foster daughter is unable
- 20 to receive due to the Proclamations.
- 21 24. My foster daughter is forced to wear faulty dental braces due to the Proclamations.
- 22 25. My children normally attend school in Washington state.
- 23 26. My children's schools are closed as a result of the Proclamations.
- 24 27. But for the Proclamations, my children's schools would be open.
- 25 28. My children are deprived of the ability to attend school due to the Proclamations.
- 26 29. The distance learning alternatives offered for my children are wholly inadequate.
- 27 30. My children are functionally being deprived of an education due to the Proclamations.

1 31. My children also normally participate in sports and extramural activities in Washington state.

2 32. My children's sport and extramural activities are cancelled as a result of the Proclamations.

3 33. But for the Proclamations, my children's sport and extramural groups would be active.

4 34. My children are deprived of the ability to participate in sports and extramural activities due to

5 the Proclamations.

6 35. I normally attend church in Washington state.

7 36. I and my fellow congregants are Bible-believing Christians who are compelled, as a matter of

8 religious conscience, to "not forsak[e] the assembling of ourselves together" in physical,

9 corporate worship. Hebrews 10:25 (KJV).

10 37. My church is closed as a result of the Proclamations.

11 38. But for the Proclamations, my church would be open.

12 39. I am deprived of the ability to worship at church due to the Proclamations.

13 40. I am moreover deprived of the ability to fulfil a critical religious obligation due to the

14 Proclamations.

15 41. I am also deprived of the fellowship I normally enjoy at church due to the Proclamations.

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17 SIGNED, May 19, 2020, at Yakima, Washington.

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19 By: 
CHRIS CORRY

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